

1 THE HONORABLE MARSHA J. PECHMAN

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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 IN RE: WASHINGTON MUTUAL  
10 MORTGAGE BACKED SECURITIES  
LITIGATION,

11 This Document Relates to: ALL CASES

Master Case No. 2:09-cv-00037-MJP

**DECLARATION OF ANNE L. BOX IN  
SUPPORT OF PLAINTIFFS'  
EXPEDITED MOTION TO AMEND  
SCHEDULING ORDER**

**NOTED ON MOTION CALENDAR:  
December 16, 2011**

**ORAL ARGUMENT REQUESTED**

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*Decl. of Anne Box ISO Plaintiffs' Expedited Motion to  
Amend Scheduling Order  
Case No. C09-037-MJP*

**TOUSLEY BRAIN STEPHENS PLLC**  
1700 Seventh Avenue, Suite 2200  
Seattle, Washington 98101-1332  
TEL. 206.682.5600 • FAX 206.682.2992

1 I, Anne L. Box, declare as follows:

2 1. I am an attorney with the law firm Scott+Scott LLP, counsel for Plaintiffs in this  
3 matter. I make this declaration in support of Plaintiffs' Expedited Motion to Amend the  
4 Scheduling Order. I have personal knowledge of the matters stated herein and, if called upon, I  
5 could and would competently testify thereto.

6 2. In November 2008, the United States Senate Permanent Subcommittee on  
7 Investigations initiated an investigation into some of the key causes of the 2008 financial crisis.  
8 As part of the investigation, the Senate Subcommittee used WMB as a case study in its  
9 examination of the events and actions that led to the 2008 financial crisis. Of the 1.5 million  
10 documents produced by Defendants and JPMC in this action, many were previously produced in  
11 response to Senate Subcommittee subpoenas and at least half do not pertain to this case.

12 3. On December 7 – 8, 2011, an attorney for Scott & Scott conducted an initial  
13 cursory review of the loan files located in Monroe, Louisiana. I was informed there are  
14 approximately 9,000 loan files and that each file contains approximately 300 – 500 pages of  
15 documents for an approximate total page count of 2.7 – 4.5 million pages. Representative  
16 documents contained within those files examined on December 7 – 8 include the following:  
17 identification verification; employment verification; loan application; appraisal documentation;  
18 credit report; loan approval report; exception documentation; income verification; and collateral  
19 valuation reports.

20 4. I was informed that on September 26 – 30 and October 17 – 19, 2011, five  
21 attorneys from local and Lead Counsel's firms traveled to San Francisco to review paper loan  
22 files made available by Defendants and JPMC. Plaintiffs' counsel isolated approximately 12,000  
23 pages, out of the hundreds of thousands reviewed, and requested copies of these documents from  
24 Defendants. Despite the relatively low volume of relevant documents which Plaintiffs requested  
25 be produced, Plaintiffs did not receive them until November 16, 2011.

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1           5.       Plaintiffs' counsel was informed on December 7, 2011 that Cynthia Abercrombie  
2 could not be deposed due to having suffered a stroke.

3           6.       I declare that attached to this declaration are true and correct copies of the  
4 following exhibits:

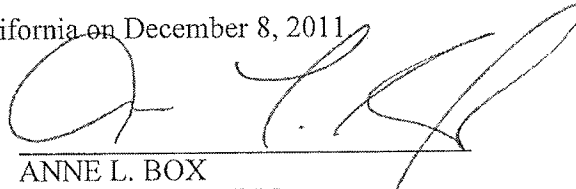
5           Exhibit A:   September 12, 2011 letter from John Pernick to Joe Guglielmo re status of  
6 defendants' document production;

7           Exhibit B:   October 25, 2011 email from You Jee Young to Plaintiffs' Counsel  
8 attaching privilege log relating to WCC productions;

9           Exhibit C:   October 26, 2011 letter from Matthew Jackson to Joshua Devore re  
10 production of loan origination files; and

11           Exhibit D:   Plaintiffs' Proposed Schedule.

12           I declare under penalty of perjury that the foregoing is true and correct, and that this  
13 declaration was executed at San Diego, California on December 8, 2011

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15 ANNE L. BOX  
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21 abox@scott-scott.com

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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 8, 2011.

/s/ Kim D. Stephens

Kim D. Stephens, WSBA #11984  
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